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September 3, 2019

Via Electronic Case Filing  
Honorable Pamela K. Chen  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *United States v. Michael Foder*, 18 CR 97 (PKC)  
Request for Permission to Leave Federal Judicial District During  
Supervised Release

Dear Judge Chen:

We are the attorneys for defendant, Michael Foder, in the above-referenced proceeding. We are writing to respectfully request permission for a change in the "Standard Conditions of Supervision" to allow Mr. Foder to travel with his family while on supervised release during the period October 4-October 8, 2019.

As the Court might recall, Mr. Foder was sentenced by the Court on February 25, 2019, to three months of imprisonment along with one (1) year supervised release. Mr. Foder completed his period of imprisonment on July 4, 2019, and is presently on supervised release.

I am informed that during his first two months of supervised release Mr. Foder has been a model releasee and is considered the lowest level of risk at the Probation Office.

The family has tentatively planned a trip to Aruba from October 4-8, 2019 for Mrs. Foder's birthday. They would be staying at a hotel on the island and will, of course, provide a detailed itinerary to Mr. Foder's Probation Officer, Michelle Rodriguez. Although this trip would be a deviation from the standard conditions of release as it is international travel, we respectfully submit that the Court should be confident that Mr. Foder will abide by all of his conditions of release and will report promptly to Probation immediately upon his return.

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We have discussed the request with Mr. Foder's Probation Officer - Michelle Rodriguez - who consents to the application. Accordingly, we are respectfully requesting that the Court allow Mr. Foder to partake in this family vacation. Mr. Foder, of course, will be in touch with his Parole Officer each day of the trip and immediately upon his return to New York.

Thank you for your consideration of this request and for your continued courtesies. Please advise should the Court have any further questions or require any additional information.

Very truly yours,

KARASYK & MOSCHELLA, LLP

  
JAMES M. MOSCHELLA

CC : (via email transmission)

Michelle Rodriguez  
Probation Officer  
U.S. Dept. Of Probation  
147 Pierrepont Street  
Brooklyn, NY 11201

AUSA Nathan Reilly (via ECF)